

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

*Attorneys for Debtors and
Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF AGENDA FOR
MARCH 2, 2022, 10:00 A.M.
OMNIBUS HEARING**

Date: March 2, 2022
Time: 10:00 a.m. (Pacific Time)
Place: Zoom Videoconference
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**PROPOSED AGENDA FOR
MARCH 2, 2022, 10:00 A.M. (PACIFIC TIME)
OMNIBUS HEARING**

I: MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)
CONTESTED MATTERS GOING FORWARD

1. **One Hundred Eighth Omnibus Objection (PURPA Claims):** *Reorganized Debtors' One Hundred Eighth Omnibus Objection to Claims (PURPA Claims) [Dkt. 11230].*

Responses Filed:

- A. Memorandum of Points and Authorities in Opposition to Reorganized Debtors' One Hundred Eighth Objection to Claims (PURPA Claims) By Winding Creek Solar LLC, Foothill Solar LLC, Hollister Solar LLC, Kettleman Solar LLC, Vintner Solar LLC, Bear Creek Solar LLC, and Allco Renewable Energy Limited [Dkt. 11476].
- B. Declaration of Thomas Melone in Support of Opposition to Reorganized Debtors' One Hundred Eighth Objection to Claims (PURPA Claims) By Winding Creek Solar LLC, Foothill Solar LLC, Hollister Solar LLC, Kettleman Solar LLC, Vintner Solar LLC, Bear Creek Solar LLC, and Allco Renewable Energy Limited [Dkt. 11477].
- C. Sur-Reply Memorandum of Points and Authorities in Opposition to Reorganized Debtors' One Hundred Eighth Objection to Claims (PURPA Claims) By Winding Creek Solar LLC, Foothill Solar LLC, Hollister Solar LLC, Kettleman Solar LLC, Vintner Solar LLC, Bear Creek Solar LLC, and Allco Renewable Energy Limited [Dkt. 11947].
- D. Reply Declaration of Thomas Melone in Support of Opposition to Reorganized Debtors' One Hundred Eighth Objection to Claims (PURPA Claims) By Winding Creek Solar LLC, Foothill Solar LLC, Hollister Solar LLC, Kettleman Solar LLC, Vintner Solar LLC, Bear Creek Solar LLC, and Allco Renewable Energy Limited [Dkt. 11948].

Related Documents:

- E. Request for Judicial Notice in Support of Reorganized Debtors' One Hundred Eighth Omnibus to Claims (PURPA Claims) [Dkt. 11231].
- F. Reorganized Debtors' Reply in Further Support of Their One Hundred Eighth Omnibus Objection to Claims [Dkt. 11654].

G. Declaration of Theodore E. Tsekerides in Support of Reply in Support of Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims [Dkt. 11655].

Related Orders:

H. Docket Text Order on January 30, 2022.

I. Docket Text Order on February 28, 2022.

Status: The Objection re PURPA Claims is going forward on a contested basis.

ITEMS 2 AND 3 TO BE HEARD TOGETHER:

2. **CDWR Motion Regarding Castle Rock Agreement:** *California Department of Water Resources' Motion for Order Determining That the Castle Rock Agreement with PG&E Cannot be Assumed and That the Department of Water Resources' Claim No. 78104 Be Paid [Dkt. 11887].*

Response Filed:

A. The Reorganized Debtors' (I) Preliminary Opposition to California Department of Water Resources' Motion for Order Determining That Castle Rock Agreement with PG&E Cannot be Assumed and That the Department of Water Resources' Claim No. 78104 be Paid and (II) Request, in the Alternative, for a Status Conference [Dkt. 11937].

Related Documents:

B. Declaration of Ghassan AlQaser in Support of Motion for Order Determining That the Castle Rock Agreement with PG&E Cannot be Assumed and That the Department of Water Resources' Claim No. 78104 Paid [Dkt. 11889].

C. California Department of Water Resources' Reply to the Reorganized Debtors' Preliminary Opposition to Motion for Order Determining That the Castle Rock Agreement with PG&E Cannot be Assumed and That the Department of Water Resources' Claim No. 78104 be Paid [Dkt. 11962].

Related Order:

D. Docket Text Order on February 28, 2022.

Status: The Motion is going forward on a contested basis.

1 3. **Reorganized Debtors' Motion to Modify Plan Injunction With Respect to**
2 **CDWR Agreement:** *Motion of the Reorganized Debtors for Entry of an Order Modifying Plan*
3 *Injunction and Compelling Arbitration of Claim of California Department of Water Resources*
4 **[Dkt. 11896].**

5 Response Filed:

6 A. California Department of Water Resources' Opposition to Reorganized
7 Debtors' Motion for Order Modifying Plan Injunction and Compelling
8 Arbitration **[Dkt. 11942]**.

9 Related Documents:

10 B. Declaration of Joshua S Levenberg in Support of Motion of the
11 Reorganized Debtors for Entry of an Order Modifying Plan Injunction and
12 Compelling Arbitration of Claim of California Department of Water
13 Resources **[Dkt. 11897]**.

14 C. Reply in Further Support of Motion of the Reorganized Debtors for Entry
15 of an Order Modifying Plan Injunction and Compelling Arbitration of
16 Claim of California Department of Water Resources **[Dkt. 11963]**.

17 D. Supplemental Declaration of Joshua S Levenberg in Support of Motion of
18 the Reorganized Debtors for Entry of an Order Modifying Plan Injunction
19 and Compelling Arbitration of Claim of California Department of Water
20 Resources **[Dkt. 11964]**.

21 Related Order:

22 E. Docket Text Order on February 28, 2022.

23 Status: The Motion is going forward on a contested basis.

24 ***RESOLVED AND CONTINUED MATTERS***

25 4. **City of Santa Clara dba Silicon Valley Power's Motion to Compel**
26 **Assumption:** *City of Santa Clara dba Silicon Valley Power's Motion to Compel Assumption or*
27 *Rejection of Executory Contract Concerning the Grizzly Development and Mokelumne*
28 *Settlement Agreement* **[Dkt. 10998]**.

Status: This Motion has been continued to April 12, 2022, by Stipulation **[Dkt. 11878]** and Order **[Dkt. 11881]**.

5. **Motion for Relief from Order re Jannings, Spiro (Claim No. 58462)** **[Dkt. 11871]**. The Motion has been dropped from the hearing pursuant to the February 28, 2022, Docket Text Order. Matter is under submission.

Securities Omnibus Claims Objection:

6. **Eighteenth (Duplicate Claims)** [Dkt. 11674]. This Securities Omnibus Objection was granted as to all Claims (except those discussed below) by **Dkt. 11818**. This matter has been resolved as to the Claims listed in **Dkt. 11967**. It has been continued to March 15, 2022, as to the Claims listed in **Dkt. 11968**.

Omnibus Claim Objections:

7. **Seventy-Sixth (No Liability / Passthrough Claims)** [Dkt. 10537]. This Omnibus Objection was granted as to most claims by **Dkt. 10705**. The Hearing as to Willie & Ora Green has been continued to March 29, 2022, by agreement of the parties.

8. **One Hundred Thirteenth (City of San Jose Claims)** [Dkt. 11844]. The Omnibus Objection has been continued to May 10, 2022 [Dkt. 11904].

9. **One Hundred Fourteenth (Passthrough Claims / Amended and Superseded Claims)** [Dkt. 11849]. This Omnibus Objection was granted as to all Claims by **Dkt. 11975**. It has been taken off calendar.

PLEASE TAKE NOTICE that copies of any pleadings filed with the Court and referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (II) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (III) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: March 1, 2022

**WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP**

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors